

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE:	)	Case No. 17-17361 (AIH)
	)	
RICHARD M. OSBORNE,	)	Chapter 11
	)	
Debtor.	)	Judge: ARTHUR I. HARRIS

**LIMITED RESPONSE OF CHICAGO TITLE INSURANCE COMPANY  
TO MOTION OF THE HUNTINGTON NATIONAL BANK FOR  
RELIEF FROM STAY AND ABANDONMENT**

Now comes Chicago Title Insurance Company (“Chicago Title”), through the undersigned counsel, and files this limited response to the Motion of The Huntington National Bank (“Huntington”) for Relief From Stay and Abandonment (Docket No. 257), with respect to real property located at 7741 Auburn Road, Concord Township, Ohio, 7472 Presley Avenue, Mentor, Ohio 7474 Presley Avenue, Mentor, Ohio and 7482 Center Street, Unit #5, Mentor, Ohio (the “Real Property”).

Chicago Title does not oppose the entry of an order in this Court granting relief from stay and abandonment with respect to the Real Property. Chicago Title provides this Limited Response for the purpose of stating that (1) it has a lien with respect to the Real Property or certain parcels thereof, and (2) there are disputes with respect to the order of priority between Chicago Title and Huntington as relates to the Real Property. The priority issues arise from the execution of Huntington’s mortgage documents, and may impact any determination as to the order of priority of the respective liens. There should be no finding or determination, as part of a stay relief and abandonment order, as to the priority of Huntington’s mortgage liens as relates to other secured/lien creditors, including Chicago Title.

{00182019-3}

Accordingly, Chicago Title consents to the entry of an order granting Huntington's Motion, but requests that there be no finding as to the priority of Huntington's lien, as relates to other creditors.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 26, 2018, a copy of the foregoing *Limited Response of Chicago Title Insurance Company to Motion of The Huntington National Bank for Relief From Stay and Abandonment* was served:

**Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:**

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